Exhibit B

From: Sachs, Daniel L. < <u>DSachs@brownrudnick.com</u>>

Sent: Friday, April 5, 2024 1:41 PM

To: Brooke Alexander < balexander@bsfllp.com >; Joseph Kaye < joseph@moskowitz-law.com >; Adam Moskowitz < Adam@moskowitz-law.com >; Howard Bushman < Howard@moskowitz-law.com >; Jose M. Ferrer < jose@markmigdal.com >; Desiree Fernandez < desiree@markmigdal.com >; David Boies < dBoies@BSFLLP.com >; Alex Boies < ABoies@BSFLLP.com >; Icarlsen < lcarlsen@bsfllp.com >; Stephen N. Zack < SZack@BSFLLP.com >; Carmen Washenko < cwashenko@BSFLLP.com >; Marc Ayala < mayala@bsfllp.com >; Adam Shaw < ashaw@bsfllp.com >; Barbara C. Lewis < barbara@moskowitz-law.com >; John Rodstrom < john@moskowitz-law.com >; Reed Forbush < rforbush@BSFLLP.com >; gromero < gromero@bsfllp.com >; Tyler Ulrich < tulrich@BSFLLP.com >

**Cc: Best, Stephen A. < SBest@brownrudnick.com >; Wolkinson, Rachel O. < RWolkinson@brownrudnick.com >; White, Jonathan D. < JWhite@brownrudnick.com >; Kerns, Daniel F. < DKerns@brownrudnick.com >; cknight@fowler-white.com; egalicia@fowler-white.com; golivares@fowler-white.com; sabreu@fowler-white.com; atifford@fowler-white.com; Paul C. Huck Jr. (paul@lawsonhuckgonzalez.com) < paul@lawsonhuckgonzalez.com >

Subject: RE: Karnas et al v. Cuban et al (S.D. Fla) 1:22-cv-22538 - Reiners 7.1a3 Cert

Counsel,

We intend to file a *Daubert* motion as to Plaintiffs' proposed expert Mr. Reiners and his report.

During his deposition we held extensive discussions on and off the record about the parties' differing opinions as to Mr. Reiners' expertise and the propriety of his opinions. We believe that this satisfies the local rule 7.1(a)(3) certification requirement as we understand that Plaintiffs will be opposing the motion.

Could you please confirm your agreement, or if you disagree, provide some times on Monday 4/8 when you are available to meet/confer.

Thanks, Dan

Daniel L. Sachs

Counsel
Brown Rudnick LLP
T: +1 202.536.1796
dsachs@brownrudnick.com